

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

UNITED STATES SECURITIES AND EXCHANGE COMMISSION,)
Plaintiff,)
vs.) Civil No. 11-723 ADM/JSM
MARLON QUAN, ACORN CAPITAL GROUP, LLC AND STEWARDSHIP INVESTMENT ADVISORS, LLC,) MOTION FOR THE LIMITED RELEASE OF FUNDS FOR THE DEFENSE OF STEWARDSHIP CREDIT ARBITRAGE FUND, LLC AGAINST CIVIL CLAIMS
Defendants,)
and)
ASSET BASED RESOURCE GROUP, LLC AND FLORENE QUAN,)
Relief Defendants.)

Pursuant to Rule 7 of the Federal Rules of Civil Procedure, Rule 7.1 of the Local Rules of the United States District Court for the District of Minnesota, and this Court's Order dated May 3, 2011, Defendants Marlon Quan, Acorn Capital Group, LLC, and Stewardship Investment Advisors, LLC hereby move the Court for an order granting the limited release of funds belonging to Stewardship Credit Arbitrage Fund, LLC ("SCAF") so that SCAF may retain counsel and defend itself against a civil complaint recently filed in the United States District Court for the Southern District of New York. This motion is based on the accompanying memorandum of law and exhibit attached thereto, any argument offered at a hearing on this motion, and the files and records of this case.

Dated: January 20, 2012

/s Thomas J. Radio

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